



Learning Education Department (Exceptional Children and Special Services) at Western Carolina University pertaining to children with disabilities and behavior and emotional problems.

3. I was hired by Attorney David A. Wijewickrama to facilitate the collection and review of documents produced in the above captioned case.
4. On August 13, 2020 Attorney Wijewickrama sent Cherokee County Public Schools ("CCPS") a letter with a Subpoena (issued by a North Carolina state court judge) requesting any and all school records for the children named in the attached list (Exhibit A).
5. In the latter part of August CCPS produced:
  - a. attendance records for some but not all students;
  - b. record of courses and final grades for some but not all students;
  - c. Exceptional Children's (EC) records for some but not all students. (In looking at courses and course codes, it was evident that the children were receiving special (EC) services but no EC records were provided); and
  - d. Discipline records for some but not all students.
6. In reviewing the documents produced by CCPS in August of 2020, I immediately realized we were missing an abundance of information we requested as indicated above.
7. CCPS failed to produce any records for certain children that were requested, including the minor child H.H.
8. On August 28, 2020, I called Anne Boring, Director for Exceptional Children (EC) for Cherokee County Schools to verbally request assistance in obtaining the records pertaining to H.H.

9. In this phone conversation we also discussed how COVID restrictions may have affected the efficiency in providing records both initially and possibly moving forward.
10. I followed up the phone call with an email sent the same day, requesting the records and attached the original Subpoena. (A copy of the email is attached to this affidavit as Exhibit B).
11. On September 8, 2020 I sent another email to Anne Boring to express our appreciation for her assistance and to see if she had any questions. (A copy of this email is attached to this affidavit as Exhibit C)
12. On this same day, 9/8/2021, Kim Gibson, Associate Superintendent Cherokee County Schools, responded in an email that she had sent the thumb drives that morning.
13. I received material from CCPS on September 16, 2020.
14. I reviewed the files produced, approximately 10 flash drives of data, over the course of approximately 5 to 7 days.
15. My review revealed that this CCPS production still failed to include specific files that should have been produced.
16. Among the missing item as to various students were: Attendance records, discipline records, Psychological Evaluations for the EC records, Revaluations required every three years, Individualized Education Plans with details about the student's learning needs and quarterly/final grade reports and standardized test results from each year up to the current year.
17. I met with Attorney Wijewickrama to discuss the missing files, and on September 21, 2020 I sent a follow-up email to Kim Gibson, Anne Boring and Jeana Conley, all with CCPS, to

request the missing information for the missing and incomplete files. (A copy of this email is attached as Exhibit D)

18. I continued my review of the files that have been produced to this point, and my continuing review revealed that more files were missing from CCPS's productions. (I noted that in some cases CCPS had sent files that were not requested because the produced files were for children that had similar names.)
19. I received no response from CCPS between September 21 and September 25, therefore on September 25, 2020 I sent another email requesting missing information for children. (A copy of this email is attached as Exhibit E)
20. On Monday, September 28, 2020 I determined that H.H.'s records were still missing, and I sent another email requesting she be added to the list of missing files to Kim Gibson (A copy of this email is attached as Exhibit F). I also edited that email (with the request for H.H.'s records) adding another request for Brian Hogan's transcript in writing and sent the email to Anne Boring and Jeana Conely. (A copy of this email is attached as Exhibit G)
21. On this same day (September 28) Kim Gibson responded by email, (attached) by stating:  
"Kristie is getting DOB's for all those kids."
22. In December of 2020. Attorney Wijewickrama received another thumb drive from CCPS.
23. I reviewed the contents of this thumb drive the first week of January and determined that it contained only the EC records for H.H. from the years 2013 and 2019.
24. On January 19, 2021, (after CCPS had returned from winter break, though they were working a hybrid schedule which is part time remotely due to the ongoing COVID-19 pandemic) I met with Attorneys Wijewickrama and Ron Moore. Based on this meeting,

on this same date, I sent an email requesting very specific documents for Hannah Hogan that were still missing. (A copy of this email is attached as Exhibit H).

25. On January 21, 2020<sup>1</sup> I received a large number of previously unproduced school records pertaining to H.H. from Anne Boring in two separate emails, which I forwarded to Attorney Wijewickrama on January 22, 2021.

Further affiant sayeth not.

**[ONE SIGNATURE PAGE FOLLOWS]  
[Remainder of Page Left Intentionally Blank]**

This 5<sup>th</sup> day of February, 2021.

Kelly Boone  
Kelly Boone, Affiant

STATE OF NORTH CAROLINA

COUNTY OF HAYWOOD

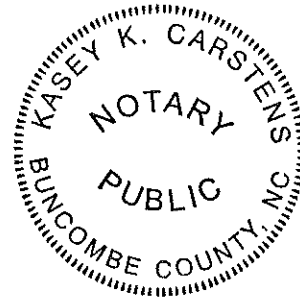
I, the undersigned notary public, do hereby certify that the above signed affiant did appear personally before me and (being known to me or having produced sufficient evidence of identification) did execute the foregoing affidavit for the purposes stated therein.

This 5<sup>th</sup> day of February, 2021.

Kasey K. Carstens  
Notary Public

08/26/2024  
My commission expires:

(SEAL)



**DAVID A. WIJEWICKRAMA, PLLC**  
ATTORNEY AT LAW  
Mailing Address: 95 DEPOT STREET  
WAYNESVILLE, NORTH CAROLINA 28786

DAVID A. WIJEWICKRAMA, Esq.

TELEPHONE: 828-452-5801 ... FACSIMILE: 828-454-1990

davidwije17@yahoo.com

August 13, 2020

VIA FAX

Records Keeper, (fax 828-837-5799)  
Cherokee County Schools, Cherokee County Board of Education  
911 Andrews Road  
Murphy, NC 228906

RE: SUBPOENA - 20 CVD 344: Allen et. al. v. Cherokee County, et. al.

Ms. Records Keeper,

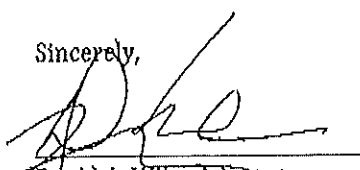
My name is David A. Wijewickrama. I am an attorney in Waynesville, NC, we along with Defense counsel have sought the enclosed Subpoena, signed by Judge Richard Walker, Chief District Court Judge. We respectfully request the information set forth in this Subpoena as it relates to every child named in Exhibit A.

If needed, both parties are willing to enter in to any necessary protective orders prior to receipt of the requested information. Time is of the essence and we need this information no later than the end of August if at all possible. If additional time is needed to gather the information requested, please let us know.

Upon request, we are willing to provide any portable drives or thumb drives needed for the information sought.

Thank you for your time and attention. I look forward to receiving this information.

Sincerely,

  
David A. Wijewickrama  
Counsel for Plaintiffs in Discovery  
95 Depot Street  
Waynesville, NC 28786  
828.452.5801(c)  
828.454.1990  
[davidwije17@yahoo.com](mailto:davidwije17@yahoo.com)

EXHIBIT

A

EXHIBIT

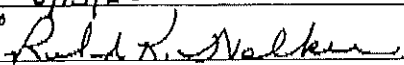
A

Labels

INITIALS	NAME	PARENTS (F)	PARENT (M)	Date Signed	Notes
PA	Patrick Allen	Jamie Allen	Melanie Dyer	Sep-16	
GA	Georgia Allen				
JA	John Allen 2				
MD	Maddox Davenport	Nathan Davenport	Melanie Dyer	Oct-16	
CD	Corbin Davenport	Nathan Davenport	Katrina Ledford	Sep-16	
KD	Katelyn Davenport				
LT	Luke Timpson		Amanda Timpson	Jun-17	
CA	Colton Ashe	Stephen Ashe	Tianda Rose Phillips	Oct-17	
CL	Cody Lovingood		Samantha Bailey (Torres)		
KL	Kaylee Lovingood				
AD	Anthony Downey	Stephen Downey	Sherry Garland	Aug-16	
MC	Mya Crapse		Sarah Crapse (Esler)	Oct-17	
AC	Audrey Colvin				
JS	Joy Shipers		Kelly Walker	Mar-17	
SW	Sharlee Walker				
WW	Vayda Walker				
AR	Alana Roberts	Michael Mathieu	Shalees Greenlee	Nov-16	
AH	Alisa Hernandez		Elizabeth (Libby) Helms (Simo)	Jan-14	
JH	Jose Hernandez			Jan-14	
ZA	Zachariah Allen	Desmond Champange	Hannah Allen	Feb-16	
DS	Dakoda Silvers	Jeremay Silvers		Oct-14	
AD	Austin Derreberry	Robert Derreberry	Alice Derreberry	Sep-16	
AD	Addison Derreberry				



Case 1:18-cv-00096-MR-WCM Document 88-3 Filed 02/05/21 Page 9 of 22

<b>STATE OF NORTH CAROLINA</b>		File No. <b>20 CVD 344</b>
CHEROKEE County		In The General Court Of Justice <input checked="" type="checkbox"/> District <input type="checkbox"/> Superior Court Division
JAMIE ALLEN, et. al.,		Additional File Numbers
<b>VERSUS</b>		<b>SUBPOENA</b>  G.S. 1A-1, Rule 4b; 8-50, -61, -63; 15A-801, -802
CHEROKEE COUNTY et. al.,		
Party Requesting Subpoena <input checked="" type="checkbox"/> State/Plaintiff <input checked="" type="checkbox"/> Defendant		<b>NOTE TO PARTIES NOT REPRESENTED BY COUNSEL:</b> Subpoenas may be produced at your request, but must be signed and issued by the office of the Clerk of Superior Court, or by a magistrate or judge.
TO Name And Address Of Person Subpoenaed RECORDS KEEPER, CHEROKEE COUNTY SCHOOLS CHEROKEE COUNTY BOARD OF EDUCATION 911 ANDREWS ROAD, MURPHY NC 28906 Telephone No. 828-837-2722		Alternate Address  Telephone No.
<b>YOU ARE COMMANDED TO:</b> (check all that apply) <input type="checkbox"/> appear and testify, in the above entitled action, before the court at the place, date and time indicated below. <input type="checkbox"/> appear and testify, in the above entitled action, at a deposition at the place, date and time indicated below. <input checked="" type="checkbox"/> produce and permit inspection and copying of the following items, at the place, date and time indicated below. <input checked="" type="checkbox"/> See attached list. (List here if space sufficient) ANY AND ALL RECORDS, INCLUDING, BUT NOT LIMITED TO, ACADEMIC RECORDS, EVALUATIONS, IBPS, PSYCH EVALUATIONS, BEHAVIOR INTERVENTION PLANS, FUNCTIONAL BEHAVIOR ASSESSMENTS, DISCIPLINE RECORDS/NOTES, MANIFESTATION DETERMINATIONS, DIAGNOSES OR ANY OTHER DOCUMENT CREATED BY OR MAINTAINED BY CHEROKEE COUNTY SCHOOLS, THEIR AGENTS, OR EMPLOYEES, PERTAINING TO THE CHILDREN LISTED IN EXHIBIT A, FOR ALL GRADES. PLEASE PROVIDE THE DOCUMENTS REQUESTED IN A PHYSICAL THUMB DRIVE OR CD, WITH NO PASSWORD OR ENCRYPTION PROTECTION TO THE OFFICE AT THE TIME AND PLACE SET FORTH. *PARTIES AGREE AND STIPULATE TO A PROTECTIVE ORDER, SHOULD SUCH ORDER BE REQUESTED.		
Name And Location Of Court/Place Of Deposition/Place To Produce LAW OFFICE OF DAVID A. WIJEWICKRAMA 95 DEPOT STREET WAYNESVILLE NC 28786		Date To Appear/Produce, Until Released 09/01/2020 Time To Appear/Produce, Until Released 9 <input checked="" type="checkbox"/> AM <input type="checkbox"/> PM
Name And Address Of Applicant Or Applicant's Attorney DAVID A. WIJEWICKRAMA, ESQ. 95 DEPOT STREET WAYNESVILLE NC 28786 Telephone No. Of Applicant Or Applicant's Attorney 828.452.5801 / 828.454.1990(E)		Date 8/13/20 Signature  <input type="checkbox"/> Deputy CSC <input type="checkbox"/> Assistant CSC <input type="checkbox"/> Clerk Of Superior Court <input type="checkbox"/> Magistrate <input type="checkbox"/> Attorney/DA <input checked="" type="checkbox"/> District Court Judge <input type="checkbox"/> Superior Court Judge
<b>RETURN OF SERVICE</b>		
I certify this subpoena was received and served on the person subpoenaed as follows: By <input type="checkbox"/> personal delivery. <input type="checkbox"/> registered or certified mail, receipt requested and attached. <input type="checkbox"/> telephone communication by Sheriff (use only for a witness subpoenaed to appear and testify). <input type="checkbox"/> telephone communication by local law enforcement agency (use only for a witness subpoenaed to appear and testify in a criminal case). <b>NOTE TO COURT:</b> If the witness was served by telephone communication from a local law enforcement agency in a criminal case, the court may not issue a show cause order or order for arrest against the witness until the witness has been served personally with the written subpoena. <input type="checkbox"/> I was unable to serve this subpoena. Reason unable to serve:		
Service Fee \$ <input type="checkbox"/> Paid <input type="checkbox"/> Due	Date Served	Name Of Authorized Server (type or print) _____ Signature Of Authorized Server _____ Title/Agency _____
<b>NOTE TO PERSON REQUESTING SUBPOENA:</b> A copy of this subpoena must be delivered, mailed or faxed to the attorney for each party in this case. If a party is not represented by an attorney, the copy must be mailed or delivered to the party. This does not apply in criminal cases. AOC-G-100, Rev. 2/10 © 2018 Administrative Office of the Courts (Please use reverse side)		



Kelly Boone &lt;krboone3305@gmail.com&gt;

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**CC schools subpoena**

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Kelly Boone &lt;krboone3305@gmail.com&gt;

Fri, Aug 28, 2020 at 5:51 PM

To: Anne Boring &lt;anne.boring@cherokee.k12.nc.us&gt;

Ms. Boring,

Per our phone conversation this afternoon, here is the subpoena. We are in need of any and all records you have on these children from preschool to present. We tried to list some of the specifics but I want to be sure nothing is overlooked hence the need for any and all information. Even if they were referred but did not qualify and you have that information that would be helpful in our purpose.

I realize you may not have access to some records if they are not identified and if that is the case if you know who could provide those records please forward their information to me.

A few more records that have come to mind and are not listed specifically but would be beneficial include:

-discipline records including but not limited to any interventions or parent conferences, detention, offenses, ISS and/or OSS. I don't know if your county uses Educator Handbook or if the discipline records accessible by administrators would be the most thorough.

-Standardized test results k-present

- Attendance records including tardies Pre-K-present

-All evaluations including Reports from independent evaluators pre-k-present

-Service referrals - speech, hearing, eyesight, Counseling, teacher and parent referrals, etc. Pre-k to present

-Conduct/behavior classes or programs the student participated in Pre-K to present

- Counseling records Pre-K to present

- Request for transfer records so we know what other systems to request information from

- Courses and Grades K- present. We got a few transcripts but all were not current.

- Master list of course codes specific to your LEA.

- Copies of schedules for middle and high school or an indication as to what special topics or Non-Reporting courses are for each student as shown on the transcripts.

We really need all records you have.

Please do not hesitate to contact me with any questions or concerns.

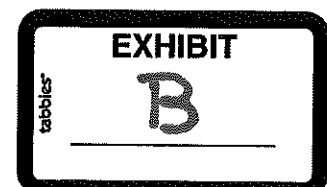
Thank you for your time,

Kelly Boone

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[20200828170503561.pdf](#)

282K





Kelly Boone &lt;krboone3305@gmail.com&gt;

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**CC schools subpoena**

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david wije <davidwije17@yahoo.com>  
To: Kelly Boone <krboone3305@gmail.com>

Fri, Aug 28, 2020 at 5:01 PM

Kelly, I appreciate your efforts, please forward this subpoena to the Cherokee County Schools EC Services Director, Anne Boring. Please gather what ever records they may have on file to assist in compliance of Judge Walkers Subpoena.

Best,  
David Wijewickrama



20200828170503561.pdf  
282K



Kelly Boone &lt;krboone3305@gmail.com&gt;

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**Student Files**

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**Kelly Boone** <krboone3305@gmail.com>

Tue, Sep 8, 2020 at 11:45 AM

To: Anne Boring &lt;anne.boring@cherokee.k12.nc.us&gt;

Cc: David Wije &lt;davidwije17@yahoo.com&gt;

Good Morning

I just wanted to touch base with you and see if you had any questions about my email sent August 28 and to see if you have an estimated time frame for when we could get the information.

Please let me know if you did not receive the email with the subpoena and request and I will resend it to you.

I really appreciate your assistance in providing what we need to move forward.

Thank you,  
Kelly Boone





Kelly Boone &lt;krboone3305@gmail.com&gt;

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**Student Files**

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Gibson, Kim <kim.gibson@cherokee.k12.nc.us>  
To: "Boring, Anne" <anne.boring@cherokee.k12.nc.us>, krboone3305@gmail.com  
Cc: Jeana Conley <jeana.conley@cherokee.k12.nc.us>

Tue, Sep 8, 2020 at 1:22 PM

Hi Kelly,

I actually sent the thumb drives by certified mail this morning. The mailed envelope includes a thumb drive from each school with student documents and one thumb drive only has EC information. The thumb drives are labeled.

Please let me know if you need additional information.

Kim Gibson  
Associate Superintendent

On Tue, Sep 8, 2020 at 12:03 PM Boring, Anne <anne.boring@cherokee.k12.nc.us> wrote:

[Quoted text hidden]

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Thank you,

**Anne L. Boring**

Director of Exceptional Children  
Cherokee County Schools

Phone: 828-837-0945

Fax: 828- 837-4351

NOTICE: This message is intended only for the designated recipient(s). It may contain confidential or proprietary information and may be subject to other confidentiality protections. Any review, copying, printing, disclosure, distribution, or any other use by any other person or entity is strictly prohibited. If you are not a designated recipient, or believe you have received this email in error, please reply to the sender and delete the copy you received.

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North Carolina Public Records law and may be disclosed to third parties.

E-mail correspondence to and from this sender may be subject to the  
North Carolina Public Records law and may be disclosed to third parties.



Kelly Boone &lt;krboone3305@gmail.com&gt;

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**Student Files**

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**Kelly Boone** <krboone3305@gmail.com>

Mon, Sep 21, 2020 at 3:01 PM

To: "Gibson, Kim" &lt;kim.gibson@cherokee.k12.nc.us&gt;

Cc: "Boring, Anne" &lt;anne.boring@cherokee.k12.nc.us&gt;, Jeana Conley &lt;jeana.conley@cherokee.k12.nc.us&gt;

I just wanted to thank you for the thumb drives and all the information they contain. There are a few students we still need some data for specific time frames. If I send a detailed list and it is in your system, would it be possible to get those? There aren't many. Also I think we may have received a couple of the wrong records, maybe a siblings. For example : we need Luke Timpson and we received Lane Timpson. Same parents but the ages do not match. I hate to even ask but it is imperative we have this information if it is accessible.

Thank you again,  
Kelly Boone

On Tue, Sep 8, 2020 at 1:22 PM Gibson, Kim <kim.gibson@cherokee.k12.nc.us> wrote:  
[Quoted text hidden]





Kelly Boone &lt;krboone3305@gmail.com&gt;

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**Student Files**

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Kelly Boone &lt;krboone3305@gmail.com&gt;

Fri, Sep 25, 2020 at 1:24 PM

To: "Gibson, Kim" &lt;kim.gibson@cherokee.k12.nc.us&gt;

Cc: "Boring, Anne" &lt;anne.boring@cherokee.k12.nc.us&gt;, Jeana Conley &lt;jeana.conley@cherokee.k12.nc.us&gt;

Hi,

I have a few more records we need to try to locate.

Michael Carter - We received the wrong record. It was for Nicholas Ghannon Carter.

Mya Crapse - If you have a historical transcript for her that would be sufficient. We just need her Elementary information.

Anthony Downey - Any records

Alisia Hernandez - EC records

Emily Maney - We got the wrong file again - we received Anslee Kamille Maney

Desean Patterson - Historical Transcripts, evaluations, counseling records

Tyler Patterson - Historical Transcripts, evaluations, counseling records

Alana Roberts - anything - we received nothing - preschool or K-1

Breanna Sherman - Anything before High School? all we received were 2 years of high school

Joy Shippers - anything

Luke Timpson - Again we received the wrong records-we received Lane Timpson

Patrick Allen - anything

I am trying to check and see if they were in other systems but records indicate they were in Cherokee County some of these times so maybe even transfer records.

Thank you -

Kelly

[Quoted text hidden]







Kelly Boone &lt;krboone3305@gmail.com&gt;

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**Student Files**

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Kelly Boone &lt;krboone3305@gmail.com&gt;

Mon, Sep 28, 2020 at 12:43 PM

To: "Gibson, Kim" &lt;kim.gibson@cherokee.k12.nc.us&gt;

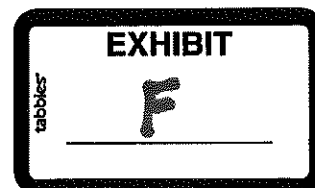
Can you add the following to the list I sent Friday:

Hannah Hogan  
Molly Cordell  
Heaven Cordell

Thank you for your diligence in this matter.

Kelly Boone

[Quoted text hidden]





Kelly Boone &lt;krboone3305@gmail.com&gt;

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**Student Files**

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**Kelly Boone** <krboone3305@gmail.com>

Mon, Sep 28, 2020 at 12:49 PM

To: "Boring, Anne" &lt;anne.boring@cherokee.k12.nc.us&gt;

Cc: Jeana Conley &lt;jeana.conley@cherokee.k12.nc.us&gt;

Can you add the following to the list I sent Friday:

Hannah Hogan

Molly Cordell

Heaven Cordell

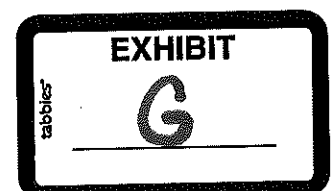
Brian Hogan - transcript only (this is a parent to Hannah Hogan)

If you need a new order please let me know and we will get it to you as soon as possible.

Thank you for your diligence in this matter.

Kelly Boone

[Quoted text hidden]





Kelly Boone <krboone3305@gmail.com>

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## Student Files

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**Gibson, Kim** <kim.gibson@cherokee.k12.nc.us>  
To: Kelly Boone <krboone3305@gmail.com>

Mon, Sep 28, 2020 at 1:55 PM

Kristie is getting the DOB's for all of those kids.  
[Quoted text hidden]



Kelly Boone &lt;krboone3305@gmail.com&gt;

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**Student Files**

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Kelly Boone &lt;krboone3305@gmail.com&gt;

Tue, Jan 19, 2021 at 4:32 PM

To: "Boring, Anne" &lt;anne.boring@cherokee.k12.nc.us&gt;, "Gibson, Kim" &lt;kim.gibson@cherokee.k12.nc.us&gt;

Cc: Jeana Conley &lt;jeana.conley@cherokee.k12.nc.us&gt;

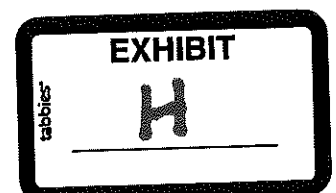
Good Afternoon,

Once again I would like to thank you for all the time and efforts you have put into sending us the records we have requested. The last correspondence we received was an envelope with the list of students sent in the email requesting their missing records and their birthdates written beside each one and one flash drive with Hannah Hogan's EC records( including a consent form and psych evaluation from 2013 and the Annual review/Reevaluation forms -current eligibility and IEP from 2019). We are in dire need of any and all of her school records including but not limited to her full EC record from 2013 to present including: Reevaluation forms from 2016(performed every 3 years), any other psych evaluations -2016 and 2019, grades, discipline records, counseling records, - all of her school records 2011 to present. If she transferred out of your system and back into your system please include those transfer records or contact information for us to obtain such information.

Hannah Jean Hogan DOB 1/16/2006 records indicate she attended Peachtree Elem School and Andrews Middle School.

We are also still in need of the other student's records on the prior email. I will send that list with names and birthdates in a separate email as our focus today is on Ms. Hogan. We need the information for Ms Hogan ASAP. Please do not hesitate to call if you have any questions or need to discuss anything further.

Thank you,  
Kelly Boone  
(828)400-3305  
[Quoted text hidden]





Kelly Boone &lt;krboone3305@gmail.com&gt;

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**Student Files**

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Boring, Anne &lt;anne.boring@cherokee.k12.nc.us&gt;

Thu, Jan 21, 2021 at 3:26 PM

To: Kelly Boone &lt;krboone3305@gmail.com&gt;

Cc: "Gibson, Kim" &lt;kim.gibson@cherokee.k12.nc.us&gt;, Jeana Conley &lt;jeana.conley@cherokee.k12.nc.us&gt;

Here is everything that is in her most recent IEP folder. I will send the contents within her auxiliary folder in a follow up email to this one.

<a href="#">HH Reports and Evals.pdf</a>
HH 2019 Reevaluation.pdf
HH 2020.2021 Annual Review.pdf

[Quoted text hidden]

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**3 attachments**

HH Initial Placement.pdf  
17758K

HH Parent Contacts.pdf  
1360K

HH Parent Right Hanbook Receipts.pdf  
1803K



Kelly Boone &lt;krboone3305@gmail.com&gt;

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**Student Files**



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**Boring, Anne** <anne.boring@cherokee.k12.nc.us>

Thu, Jan 21, 2021 at 4:07 PM



To: Kelly Boone &lt;krboone3305@gmail.com&gt;

Cc: "Gibson, Kim" &lt;kim.gibson@cherokee.k12.nc.us&gt;, Jeana Conley &lt;jeana.conley@cherokee.k12.nc.us&gt;

 HH 2015.2016 IEP.pdf HH 2017.2018 IEP.pdf HH Misc..pdf

[Quoted text hidden]

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**3 attachments** HH 2018.2019 IEP.pdf  
10382K HH 2016 Reevaluation.pdf  
14484K HH Student Invitation 9.12.2019.pdf  
470K